

HARRIS COUNTY, TEXAS  
CHRISTIAN D. MENEFE (pro hac  
forthcoming)  
JONATHAN G.C. FOMBONNE (pro hac  
forthcoming)  
TIFFANY BINGHAM (pro hac forthcoming)  
SARAH UTLEY (pro hac forthcoming)  
BETHANY DWYER (pro hac forthcoming)  
R. CHAN TYSOR (pro hac forthcoming)  
ALEXANDRA KEISER (pro hac forthcoming)  
1019 Congress Street  
15<sup>th</sup> Floor  
Houston, Texas 77002  
Telephone: (713) 274-5102  
Email: jonathan.fombonne@harriscountytexas.gov  
tiffany.bingham@harriscountytexas.gov  
sarah.utley@harriscountytexas.gov  
bethany.dwyer@harriscountytexas.gov  
chan.tysor@harriscountytexas.gov  
alex.keiser@harriscountytexas.gov

*Attorneys for Plaintiff  
Harris County, Texas*

DEMOCRACY FORWARD FOUNDATION  
ELENA GOLDSTEIN (pro hac forthcoming)  
SKYE PERRYMAN (pro hac forthcoming)  
P.O. Box 34553  
Washington, D.C. 20043  
Telephone: (202) 448-9090  
Fax: (202) 796-4426  
Email: egoldstein@democracyforward.org  
sperryman@democracyforward.org

PUBLIC RIGHTS PROJECT  
JILL HABIG, State Bar # 268770  
490 43rd Street, Unit #115  
Oakland, CA 94609  
Telephone: (510) 738-6788  
Email: [jill@publicrightsproject.org](mailto:jill@publicrightsproject.org)

*Attorneys for Plaintiff  
Harris County, Texas*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, *et*  
*al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF DARRELL HAHN IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY RELIEF**

**DECLARATION OF DARRELL HAHN**

J, DARRELL HAHN, declare:

1. I am a Director of Permits for the Harris County Office of the County Engineer (OCE). As Director of Permits, I manage groups relating to permitting for unincorporated Harris County, including residential, commercial site development, buildings, public works and infrastructure, right of way projects, floodplain management, inspections and compliance. I also serve as Floodplain Administrator and Community Rating System Coordinator for Harris County.

2. I have held this position since 2024 and have worked in permitting for Harris County for 17 years. I previously served in the United States Air Force for ten years. I am a licensed professional engineer in the State of Texas and a Certified Floodplain Manager.

3. I am familiar with the facts and circumstances of this matter, in which President Trump issued Executive Order 14210 to “commence a critical transformation of the Federal bureaucracy”. Specifically, the Order directed all federal agencies to “eliminat[e] waste, bloat, and insularity” by engaging in “large-scale reductions-in-force (RIFs)” and preparing “reorganization plans.”<sup>1</sup> This overhaul has included actual, impending and potential RIFs to agencies which would impact the operations of the Harris County Office of the County Engineer and cause harm to residents of Harris County.

4. I make this declaration in support of the above-captioned case. Except as otherwise stated, I have personal knowledge of the matters set forth herein and can and will testify thereto if called upon to do so.

**Harris County, Texas**

5. Harris County has a population of over 5 million residents and is continuing to grow.<sup>1</sup> Harris County is the most populous county in Texas and along the coast of the Gulf Coast, as well as the third most populous county in the nation. Harris County has a land area coverage of 1,706.96 square miles, which includes the City of Houston; complex highway infrastructure and industrial

---

<sup>1</sup> *Quick Facts: Harris County, Texas*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/Tact/table/harriscountytexas/LNDI10220> (last visited Apr. 23, 2025).

development; and interconnected waterways including bayous, reservoirs, and the Houston Ship Channel.<sup>2</sup>

6. Harris County is prone to flooding and other natural disasters due to its proximity to the Gulf Coast, flat and low-level elevation, and rapid urbanization. Harris County experiences a major flooding event approximately every two years, resulting in hundreds of millions of dollars in damages since the inception of the Harris County Flood Control District in 1937. More funds have been paid to Harris County than to any other community under the National Flood Insurance Program (NFIP).<sup>3</sup>

#### **Harms Related to Reorganization of U.S. Department of Homeland Security**

7. In the past 10 years, FEMA has declared 14 disasters in Harris County, including four declarations in 2020.<sup>4</sup> These disaster declarations have included hurricanes, biological events, severe thunderstorms, and severe ice storms and cold. Major disaster declarations provide federal assistance to the impacted area through individual assistance, public assistance, and hazard mitigation assistance. These supplemental grants and loan programs support individuals, households, government entities, and certain non-profits in recovery from disaster damages. Additionally, FEMA has operated Disaster Recovery Centers within Harris County to provide one-on-one support for impacted constituents following disasters.<sup>5</sup>

8. Harris County has reviewed information related to the RIFs the Trump Administration is currently implementing. It is clear that large-scale cuts to the federal workforce are underway and more are anticipated. Department of Homeland Security Secretary, Kristi Noem, has stated that FEMA should be completely eliminated.

---

<sup>2</sup> *Id.*

<sup>3</sup> *Harris County's Flooding History*, HARRIS CNTY Flood CONTROL DIST., <https://www.hcfcd.org/About/Harris-Countys-Flooding-History> (last accessed April 24, 2025).

<sup>4</sup> *Disaster Declarations for States and Counties*, Fed. Emergency Mgmt. Agency, <https://www.fema.gov/data-visualization/disaster-declarations-states-and-counties> (last accessed April 24, 2025).

<sup>5</sup> Press Release, Fed. Emergency Mgmt. Agency, Disaster Recovery Center Opens in Harris County (June 17, 2024), <https://www.fema.gov/press-release/2024Q617/disaster-recovery-center-opens-harris-county>.

1 9. Harris County will be impacted by significant reductions in the federal workforce across  
2 agencies because it relies on the critical services that many of these federal agencies provide.  
3 However, Harris County will be particularly impacted by any cuts made to FEMA personnel, given  
4 its susceptibility to natural disasters and frequent disaster declarations.

5 10. The most significant assistance that FEMA provides to my division of Harris County takes  
6 the form of routine, non-emergency "steady state" services. Letters of Map Revisions (LOMR) are  
7 an example of these types of steady state FEMA interactions. OCE receives weekly, if not daily,  
8 emails from developers who are attempting to have their properties removed from federally  
9 designated floodplains based on improvements they have already undertaken at the property.  
10 Developers send their designs to OCE for comments and approval. If OCE determines the  
11 developer's actions are sufficient to mitigate the effects of flooding, OCE approves the change and  
12 sends the letter to FEMA for approval. FEMA reviews OCE's work and then returns the letter to the  
13 developer. These letters are important to developers because the property's presence in a floodplain  
14 requires the developer to obtain flood insurance. Redesignating the property as not being in the  
15 floodplain saves the developer from having to obtain flood insurance, thereby saving money for  
16 local businesses and residents. This is a critical part of our regulations that implement the National  
17 Flood Plain Insurance Program, which provides flood insurance our 5 million residents.

18 11. If FEMA experiences a RIF, developers will experience longer wait times before they receive  
19 their LOMRs and will incur extra costs as a result. Any additional time and cost incurred by these  
20 developers, would be detrimental to economic development in Harris County. Delays in processing  
21 LOMR's add to the workload of OCE by necessitating increased communication required with each  
22 application. OCE also works routinely with FEMA on flood insurance denials (Section 1316 of the  
23 National Flood Insurance Act of 1968) which are issued against properties whose owners have  
24 demonstrated a refusal to comply with the Regulations of Harris County, Texas for Floodplain  
25 Management. OCE relies on a responsive FEMA staff particularly when attempting to reverse one  
26 of these Section 1316 denials to restore flood insurance availability once a property owner comes  
27 into compliance. A reduction in available staff at FEMA to assist in this complicated process would  
28 cause these reversals to take even longer than they do now and would unduly add to OCE workload.



1 In order to obtain coverage under NFIP, a local government must have controls adequate to ensure  
2 flooding damage is mitigated. To that end, the State of Texas directed Harris County to implement  
3 regulations to obtain NFIP coverage. Harris County promulgated the Harris County Regulations for  
4 Floodplain Management (Floodplain Regulations) to satisfy NFIP requirements. As a part of that  
5 process, Harris County must obtain approval from FEMA before making any changes to the  
6 Floodplain Regulations. Substantial FEMA staff reduction would impair our ability to process  
7 important regulatory updates in a timely manner thereby impacting our ability to comply with  
8 statutory obligations such as “adopting permanent land use and control measures with enforcement  
9 provisions” as well as “participating in floodplain management and mitigation initiatives such as the  
10 [NFIP]’s Community Rating System...”<sup>6</sup> Without FEMA staff to process these important documents,  
11 our regulatory program would be hamstrung and cause irreparable harm to both our operations and  
12 our communities.

13 12. Another facet of FEMA’s assistance to Harris County comes from its grant programs. FEMA  
14 has provided many grants to Harris County to ensure the protection of its residents. Harris County  
15 receives FEMA funds for its Home Buyout Program, Community Rating System, MAAPNext, and  
16 has even received funds to update its Hazard Mitigation Plan. Each of these programs help to keep  
17 Harris County residents safe by ensuring homeowners have updated and accurate information  
18 regarding their property’s risk in case of flood; are able to sell said property to the county if it is in a  
19 floodway or repetitive loss area; and that the county is able to provide best hazard mitigation  
20 strategies to reduce community threat. Without timely funds for these programs, Harris County  
21 residents would be uninformed and at-risk.

22 13. Given the extensive coordination required between OCE and FEMA, any RIF that impacts  
23 the efficacy of FEMA would have a direct negative impact upon residents of Harris County. OCE  
24 depends on FEMA staff to ensure local developers are complying with floodplain regulations; that  
25 citizens are not incurring additional costs from unnecessary insurance; and to fund projects which  
26 provide essential information and buy-out programs for those at risk. Thus, delays in documentation  
27

28 <sup>6</sup> Tex. Water Code § 16.315.

1 review or in receiving grant funds would harm Harris County residents.

2 14. Thus, Harris County will be imminently harmed by any RIF that impacts FEMA because  
3 FEMA will no longer be as effective in administering the steady state programs described above.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6 Executed on April 29, 2025 at Houston, Texas.

7  
8  
9   
10 \_\_\_\_\_  
11 DARRELL HAHN  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28